

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

UNITED STATES OF AMERICA	*	Crim. No. 2:16-cr-00007-KS-MTP
	*	Hon. Keith Starrett
	*	
v.	*	
	*	
	*	
CHARLES BOLTON, ET AL		

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**RESPONSE TO ORDER TO SHOW CAUSE**

NOW INTO COURT, comes the undersigned counsel, Sharon Henderson, and files a Response to the Court's Order To Show Cause. In the order, the Court appears to address two central issues: 1) the Huntley/Henderson duplicate filing of the Motion For a New Trial (Motion To Vacate); and 2) Attorney Henderson's Knowledge of the Motion Filing by Attorney Huntley. Undersigned counsel addresses these issues below and respectfully states as follows:

1. On or about April 5, 2017, I was contacted to possibly represent Charles Bolton to file a (Motion for New Trial) Motion to Vacate Conviction and Sentence on his behalf . Counsel was advised that the deadline to file said Motion was April 11, 2017 and that Attorney Huntley had ceased communicating with Mr. Bolton and he was afraid he would miss the deadline. Counsel then recommended that more effort be made to contact Attorney Huntley to verify whether he was going to meet the filing deadline.
  
2. On April 11, 2017, counsel received the attached e-mail from the National Legal Professional Associates forwarding their prepared pleadings to be used in Mr. Bolton's

case because nothing had been filed . (See Exhibit A) I was informed that this is the identical document previously provided to Attorney Huntley for his filing on Mr. Bolton's behalf.

3. That at or about 9:00 p.m. on April 11, 2017, I was informed again that there had been no success in communicating with Attorney Huntley, and that the filing deadline was looming. I then checked the court docket for any filings by Attorney Huntley on behalf of Charles Bolton and there was no motion for new trial docketed. Counsel therefore began preparing to enter her appearance and motion and filed same.
4. That at 10:20 pm I had completed filing my Notice of Appearance and at 11:07 p.m. the Motion filing was completed. That Attorney Huntley's motion filing was completed at 10:10pm, ten minutes prior to my appearance filing, therefore I did not received electronic notification of Huntley's filing. In attempting to meet the midnight deadline, Counsel spent the time from the last check of the court docket at 9pm until the time of the completion of appearance and motion filing to prepare and file said documents.

It was never counsel's intention to file a duplicate or redundant motion or to create an unnecessary burden or expense of judicial resources. Counsel was motivated purely by the need to save the deadline for a critical pleading. For this occurrence, I am apologetic and beg the Court's forgiveness and request that the Court assess no sanctions.

**Respectfully Submitted,**

/s/ Sharon Henderson

Sharon Henderson MSB 8898

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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which notifies all counsel of record.

/s/**Sharon Henderson**  
Sharon Henderson  
8/7/2017